1 RENE L. VALLADARES Federal Public Defender District of Nevada State Bar No. 11479 William Carrico 3 Assistant Federal Public Defender State Bar No. 003042 4 411 E. Bonneville, Ste. 250 5 Las Vegas, Nevada 89101 (702) 388-6577/Phone 6 (702) 388-6261/Fax 7 Attorney for Thomas A. Cecrle 8 UNITED STATES DISTRICT COURT 9 10 DISTRICT OF NEVADA 11 12 UNITED STATES OF AMERICA, 2:12-cr-400-JAD-GWF 13 Plaintiff, STIPULATION TO CONTINUE 14 **SENTENCING DATE** VS. (First Request) 15 THOMAS A. CECRLE, 16 Defendant. 17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United 18 States Attorney, and Steven W. Myhre, Assistant United States Attorney, counsel for the United 19 States of America, and Rene L. Valladares, Federal Public Defender, and William Carrico, Assistant 20 Federal Public Defender, counsel for THOMAS A. CECRLE, that the sentencing hearing scheduled 21 for Monday, July 26, 2015 at the hour of 2:30 p.m., be vacated and continued to a date and time 22 convenient to the Court. However, in no event earlier than thirty (30) days. 23 This Stipulation is entered into for the following reasons: 24 1. Counsel for the defendant requires additional time to prepare for sentencing. 2.5 2. The defendant is not incarcerated and does not object to the continuance. 26 /// 27 2.8 ///

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1	3. The additional time	e requested herein	is not sought for p	urposes of delay, but merely	
2	to allow counsel for Defendant sufficient time within which to effectively and thoroughly prepare				
3	for the instant sentencing hearing.				
4	4. Additionally, denia	al of this request fo	or continuance cou	ld result in a miscarriage of	
5	justice.				
6	5. The parties agree to the continuance.				
7	6. This is the first request for a continuance of the sentencing hearing filed herein.				
8	DATED this 13 th day of Ja	anuary, 2015.			
9	RENE L. VALLADARES		DANIFI (G. BOGDEN	
10	Federal Public Defender			ites Attorney	
11	/s/ William Carrico By:		/s/ Steven V By:	V. Myhre	
12	WILLIAM CARRICO, Assistant Federal Public Defe	ender	STEVEN V	V. MYHRE, inited States Attorney	
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2	UNITED STATES DISTRICT COURT				
3	DISTRICT OF NEVADA				
4					
5	UNITED STATES OF AMERICA, 2:12-cr-400-JAD-GWF				
6	Plaintiff,				
7	vs.				
8	THOMAS A. CECRLE,				
9	Defendant.				
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11					
12	ORDER				
13	Based on the pending Stipulation of counsel, and good cause appearing,				
14	IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Monday,				
15	January 26, 2015, be vacated and continued to at the hour of m.				
16	DATED this day of January, 2015.				
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18	UNITED STATES DISTRICT JUDGE				
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